

MR. JEFFERY ALONZO SIMMS #198625  
DELAWARE CORRECTIONAL CENTER  
1181 PADDOCK ROAD  
SMYRNA, DELAWARE 19977  
(PLAINTIFF)

v.  
(DEFENDANT)

DEFENDANT'S ATTORNEY

MR. RALPH K. DURSTEIN \*\*\*  
DEPARTMENT OF JUSTICE 6th FLOOR  
820 N. FRENCH STREET  
WILMINGTON, DELAWARE 19801

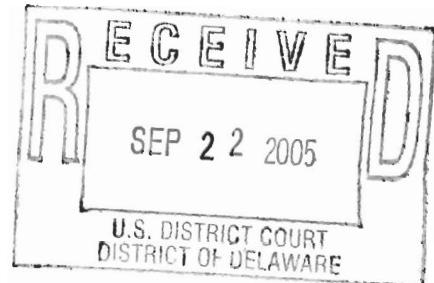
M JANE BRADY STATE ATTORNEY GENERAL  
DEPARTMENT OF JUSTICE  
820 N. FRENCH STREET  
WILMINGTON, DELAWARE 19801

MOTION FOR PROTECTIVE ORDER

CIVIL ACTION CASE: 04-941-SLR  
AND CIVIL ACTION 04-1205-SLR

SEPTEMBER 20-2005

PLEASE FILED AND RESPOND AT  
THE EARLIEST EFFECTIVE DATE



IN THE UNITED STATES SUPREME COURT, THE SUPREME LAW OF THE LAND. THE UNITED STATES CONSTITUTION, THE COURT HAS DETERMINED THAT MOST OF THE CONSTITUTIONAL RIGHTS CONTAINED IN THE BILL OF RIGHTS SURVIVE INCARCERATION, ALBEIT IN A DIMINISHED STATE. FIRST AMENDMENT RIGHTS TO FREE SPEECH AND THE FREE EXERCISE OF RELIGION, THE EIGHTH AMENDMENT RIGHT TO BE FREE OF CRUEL AND INHUMANE PUNISHMENT, THE RIGHT NOT TO BE DEPRIVED OF A LIBERTY INTEREST WITHOUT DUE PROCESS, THE RIGHT TO PETITION COURTS FOR RELIEF, AND THE RIGHT TO BE PROTECTED FROM DISCRIMINATION ARE ALL EXAMPLES OF CONSTITUTIONAL RIGHTS THAT THE COURT HAS HELD ARE AVAILABLE TO PRISONERS.

SIGNATURE OF MOVANT,

*Mr. Jeffery Alonzo Simms*  
PRO SE, AND MOVANT MR. JEFFERY ALONZO SIMMS #198625  
DELAWARE CORRECTIONAL CENTER 1181 PADDOCK ROAD  
SMYRNA, DELAWARE 19977

TO: THE HONORABLE JUDGE  
SUE L. ROBINSON,  
THE UNITED STATES DISTRICT  
COURT FOR THE DISTRICT OF  
DELAWARE 19801-3570  
HONORABLE JUDGE RICHARD F. STOKES  
SUSSEX COUNTY COURTHOUSE  
1 THE CIRCLE, SUITE 2  
GEORGETOWN, DELAWARE 19947

*Melanie Withers*  
(MELANIE WITHERS)  
DEPARTMENT OF JUSTICE  
114 E. MARKET STREET  
GEROGETOWN, DELAWARE 19947

MR. JEFFERY ALONZO SIMMS #198625  
DELAWARE CORRECTIONAL CENTER  
1181 PADDOCK ROAD  
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(PLAINTIFF)

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ORDER

IT IS HEREBY ORDER, THIS \_\_\_\_\_ DAY OF \_\_\_\_\_, 2005 \_\_\_\_\_ THAT THE  
ATTACHED MOTION FOR \_\_\_\_\_

HAS BEEN READ AND CONSIDERED.

IT IS ORDERED THAT THE MOTION IS HEREBY GRANTED OR DENIED AND OR  
IT IS FURTHER ORDER THAT \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

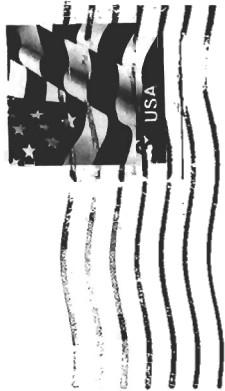
ORDER BY THE HONORABLE JUDGE \_\_\_\_\_

RESPONDENT THE HONORABLE JUDGE SUE L. ROBINSON  
AND THE CLERK OF THE COURT MR. PETER T. DALLOO  
UNITED STATES DISTRICT COURT 844 N. KING STREET BOX 18 WILMINGTON,  
DELAWARE 19801-3570

SIGNATURE OF MOVANT,  
PRO SE, AND MOVANT MR. JEFFERY ALONZO SIMMS #198625  
DEL AWARE CORRECTIONAL CENTER  
1181 PADDOCK ROAD  
SMYRNA, DELAWARE 19977

SINCERLEY,

Jeffrey Simms  
BL# 198625 UNIT D-0-3 East  
DELAWARE CORRECTIONAL CENTER  
181 PADDOCK ROAD



United States District Court  
844 N. King Street Post Box 18  
Amon G. Thomas, Jr. amon federal Building  
Wilmington, Delaware 19801-3570

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